

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

BABY DOE, *et al.*,

Plaintiffs,

-v.-

JOSHUA MAST, *et al.*,

Defendants,

CIVIL NO: 3:22-cv-00049-NKM-JCH

**DEFENDANT RICHARD MAST’S MOTION TO SEAL EXHIBIT 7 TO DEFENDANT
RICHARD MAST’S MOTION TO QUASH/MODIFY SUBPOENA AND MOTION FOR
PROTECTIVE ORDER**

Defendant Richard Mast hereby moves for an order to seal Exhibit 7 (“Privilege Log 2023”) to his motion to quash/modify subpoena and motion for protective order (Dkt. No. 345), filed as a supplemental filing today (Dkt. No. 353), pursuant to Local Civil Rule 9.

In support of this motion to seal, Defendant Richard Mast states as follows: The Privilege Log 2023 (Exhibit 7) includes document descriptions incorporating information that would also be privileged and not typically included on a privilege log. They were included in the Privilege Log 2023 because the Liberty University 2023-produced documents were produced without Bates numbers and a more detailed description was necessary to make clear which documents were at issue and because Plaintiffs have had these documents in their possession for some time in any event. Thus, the Privilege Log 2023 descriptions should be considered privileged as well.

Accordingly, Defendant Mast requests that the Court order the sealing of Exhibit 7, provided to the Court by email..

A proposed Order is attached as Exhibit A to this Motion.

Dated: March 7, 2024

Respectfully submitted,

/s/David Yerushalmi

David Yerushalmi, Esq.*

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CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2024, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties for whom counsel has entered an appearance by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. I further certify that a copy of the foregoing has been served by ordinary U.S. mail upon all parties for whom counsel has not yet entered an appearance electronically: none.

/s/David Yerushalmi
David Yerushalmi, Esq.